

**Amendments to the Drawings:**

The attached replacement drawing sheet makes changes to Fig. 5b and replaces the original sheet with Figs. 5a and 5b.

Attachment: Replacement Sheet

### **REMARKS**

Claims 1-8 are pending in this application. By this Amendment, claims 1-8 are amended to clarify the language of the claims and not amended in order to overcome prior art. In particular, claims 3 and 7 are amended to clarify the subject matter of the claimed invention. Further, Fig. 5b is amended. Applicant appreciates and thanks the Examiner for indicating that claims 3-4 and 7-8 contain allowable subject matter. However, for the reasons discussed below, it is believed that all of the claims are allowable. Accordingly, reconsideration is respectfully requested.

#### **I. Objection to the Drawings**

The Office Action objects to the drawings because the term LED e mentioned at page 27, line 11 of the application is not shown in the drawings. Fig. 5b has been amended to show LED e. Accordingly, withdrawal of the objection to the drawings is respectfully requested.

#### **II. Objection to the Claims**

The Office Action objects to the term "count part" and "base clock" and other informalities. Claims 1-8 have been amended to obviate the objection, and further amended to clarify the terms and language of the claims.

Further, the Office Action recommends that the specification and the Abstract be amended to conform to the amended terms of the claims. Because Applicant believes that one skilled in the art reviewing the specification and the Abstract would understand the subject matter of the claimed invention, Applicant believes that the specification and the Abstract need not be amended. Thus, no amendment to the specification and the Abstract is made.

#### **III. The Claims Define Patentable Subject Matter**

The Office Action rejects claims 1-2 and 5-6 under 35 U.S.C. §102(b) over Rees et al. (U.S. Patent No. 5,229,787). The rejection is respectfully traversed.

Rees does not disclose or suggest a counter that counts a clock signal generated by a clock generator for a number of corresponding to the multiple of the parameter of a drive roll, thereby an operation timing at the second operating position is synchronized with an operation timing at the first operating position, as recited in independent claim 1.

The Office Action, at pages 3-4, asserts that the encoders 72 and 74 in combination with an electronic subsystem (ESS) disclose the above-noted feature of the claim. Applicant respectfully disagrees.

Rees discloses, at col. 6, lines 34-39, that encoders 72 generate a signal representing synchronous speed  $V_1(t)$ ,  $V_2(t)$  and  $V_3(t)$  and an encoder 74 generates a signal representing the asynchronous speed  $V_4(t)$ . The signals are sent to an error generator 75 in the electronic subsystem (ESS) 38 and an error signal  $\Delta V$  is produced. Nowhere does Rees disclose or suggest that a counter is present in the encoders 72, the encoder 74 and the ESS 38. In fact, as disclosed in col. 6, lines 52 - col. 7, line 9, a comparison of the voltage signals are used to generate an error signal  $\Delta V$ . Thus, it follows that Rees' imaging forming apparatus is using a voltage comparator. Therefore, because no counters are used in Rees imaging forming apparatus, Rees does not disclose or suggest the above-noted features of claim 1.

Further, for similar reasons, Rees does not disclose or suggest a counter counts a clock signal generated by a clock generator for a number corresponding to the multiple of the parameter of the drive roll, thereby an image formation timing at a second image forming position in the second image forming portion is synchronized with an image formation timing at a first image forming position in the first image forming portion, as recited in independent claim 5.

Therefore, independent claims 1 and 5 define patentable subject matter. Claims 2 and 6 depend from the respective independent claims, and therefore also define patentable subject matter, as well as for the other features they recite. Further, the Office Action has indicated that claims 3-4 and 7-8 contain allowable subject matter.

Accordingly, withdrawal of the rejection under 35 U.S.C. §102(b) is respectfully requested.

**IV. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-8 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,

  
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